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17 Attorneys for Plaintiff

18 **UNITED STATES DISTRICT COURT**
19 **SOUTHERN DISTRICT OF CALIFORNIA**

20 **Patricia Connor, Individually and on**
21 **Behalf of All Others Similarly**
22 **Situated**

23 **Plaintiffs,**
24 **v.**

25 **JPMorgan Chase Bank and Federal**
26 **National Mortgage Association a/k/a**
27 **Fannie Mae,**

28 **Defendants.**

1 Case No.: 10-cv-1284 DMS (BGS)

2 **DECLARATION OF PATRICIA**
3 **CONNOR IN SUPPORT OF**
4 **MOTION FOR ATTORNEYS'**
5 **FEES AND COSTS OF**
6 **LITIGATION**

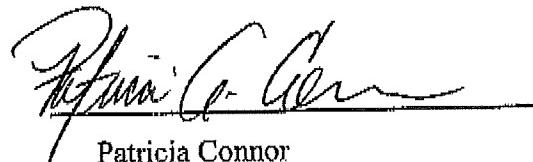
7 I, Patricia Connor, hereby declare:

- 1 1. I submit this declaration in support of the request to award an incentive
2 payment to me for my efforts in assisting in this litigation. If called as a
3 witness, I would competently testify to the matters herein from personal
4 knowledge. I am the class representative in the pending class action of
5 Patricia Connor v. JPMorgan Chase Bank (Case No: 10-cv-1284
6 DMS(BGS)).
- 7 2. After I receiving phone calls to my cell phone via autodialers from
8 Defendants as alleged in the complaint in this action, I consulted with one of
9 my attorneys Abbas Kazerounian as to whether I had a potential case.
- 10 3. Mr. Kazerounian explained this case may be a class action and after
11 explaining to me all of the duties and responsibilities that I would have to take
12 on as a class representative, I agreed to be the Class representative in this
13 matter. Throughout the course of this litigation I have participated in the
14 following ways in order to assist the Class to bring this matter to its
15 resolution:
- 16 a. Made myself available at short notice to answer questions and assist my
17 attorneys.
- 18 b. Had numerous conversations with my attorneys in describing the events
19 and the facts of this case and answering any other questions that they had.
- 20 c. Met with my attorneys in preparing for two mediations. These meetings
21 took several hours where we went over the facts of the case, Defendant's
22 claimed defenses and the facts surrounding any claims to prior express
23 consent.
- 24 d. I had to be "on call" for a mediation before the U.S. Magistrate Judge in
25 San Diego. To do this, I spent several hours with my attorney in
26 preparation of the ENE, I cleared a complete day in my schedule in case
27 my attorney needed to contact me on the date of the mediation, and
28 assisted with the mediation process.

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2 e. Met with my attorneys and reviewed close to 300 pages of documents produced
3 through discovery.
4 f. Discussed with my attorneys the terms of the Memorandum of Understanding and
5 how it affected the class.
6 g. Discussed with my attorneys the terms of the formal settlement agreement and how it
7 affected the class.

8
9 I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is
10 true and correct and that this declaration was executed at San Bernardino, California, on
11 June 8, 2012.



Patricia Connor

HYDE & SWIGART
San Diego, California

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